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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE: §
§
Darrell Ross Lee §
§ CASE NO. 13-11969-NLJ-13
DEBTOR §

DEBTOR'S MOTION TO BORROW/INCUR DEBT FOR THE PURCHASE
OF A VEHICLE AND APPLICATION FOR COMPENSATION

TO THE HONORABLE JUDGE OF SAID COURT:

DEBTOR, Darrell Ross Lee files this Debtor's Motion to Borrow/Incur Debt for the Purchase of a Vehicle, and would respectfully show the Court as follows:

1. Debtor's Chapter 13 case was filed on 4/30/2013.
2. Debtor's case was confirmed on 6/28/2013.
3. Debtor wishes to finance the purchase of a vehicle in an amount not to exceed \$15,000.00. Santander Auto Finance is attempting to assist the Debtor with financing.
4. Debtor proposes to repay the financed amount over 72 months at approximately 21% interest with a monthly payment of approximately \$372.00.
5. Amended Schedule J of Debtor's Voluntary Petition on file with the Clerk of this Court reflects sufficient disposable income to make the required payments of approximately \$372.00 per month toward the purchase of the vehicle.
6. Debtor's attorney shall be allowed an additional fee for this Motion in the total amount of \$350.00 which will be paid through the Plan by the Trustee.

FOR THESE REASONS, Debtor requests an order allowing the purchase as set forth herein, and for such other and further relief to which Debtor may show them entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtor(s)

IMPORTANT NOTICE

PURSUANT TO LOCAL BANKRUPTCY RULES 4001(c)(2) AND 9014, YOU ARE HEREBY NOTIFIED THAT NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT ON OR BEFORE TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE TO (1) THE DEBTOR AND DEBTOR'S ATTORNEY; (2) THE OFFICE OF THE U.S. TRUSTEE; (3) ANY TRUSTEE AND THE TRUSTEE'S ATTORNEY; (4) THE MEMBERS OF ANY OFFICIAL COMMITTEE, OR THE ATTORNEY FOR ANY OFFICIAL COMMITTEE IF AN ATTORNEY HAS BEEN EMPLOYED; OR, IF THERE IS NO COMMITTEE, THE TWENTY (20) LARGEST UNSECURED CREDITORS; (5) ANY PARTY REQUESTING NOTICE; (6) ANY PARTY NAMED ON A COURT-APPROVED ALTERNATIVE SERVICE LIST; (7) THE RESPONDING PARTIES; AND (8) ANY OTHER AFFECTED ENTITY.

IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

CERTIFICATE OF MAILING

The undersigned hereby certifies that on August 30, 2013, a true and correct copy of the foregoing was served on all parties in interest listed on the following mailing list by ECF and/or regular mail.

Altus Finance Co
310 W. Commerce
Altus, OK 73521

Altus Power
509 S. Main St.
Altus, OK 73521

Ccm Enterprises
Po Box 781317
Wichita, KS 67278

Central State Recovery
1314 N Main St
Hutchinson, KS 67501

Elkview General Hospital
429 W. Elm St
Hobart, OK 73651

Jackson County Memorial Hospital
P O Box 8190
Altus, OK 73522

Lamont Hanley & Associates
1138 Elm St
Manchester, NH 03101

Midwestern Loans
1119 N Main St
Altus, OK 73521

Trident Asset Management
5755 Northpoint Pkwy Ste
Alpharetta, GA 30022

Western Shamrock Corporation
801 S Abe St.
San Angelo, TX 76903-6735

U.S. Trustee
United States Trustee Attention: Bankruptcy
Dean A. McGee Ave., 4th Floor 801 S Abe St.
Oklahoma City, OK 73102-3444

Internal Revenue Service
Special Procedures-Insolvency
PO Box 7346
Philadelphia, PA 19101-7346

Oklahoma Tax Commission
Central Bankruptcy Section
120 N Robinson Ste 2000W
Oklahoma City, OK 73102-7801

John T. Hardeman
PO Box 1948
Oklahoma City, OK 73101-1948

/s/Monte J. White
Attorney for Debtor